

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

A vertical decorative border on the right side of the page, consisting of a series of stylized, interlocking S-shaped curves.

VS.

TANMAYA KABRA,

Defendants

Criminal Action No. 19-cr-10335

ASSENTED-TO MOTION TO CONTINUE TRIAL

Defendant Tanmaya Kabra (“Defendant”) hereby respectfully requests that this Court continue the trial date currently scheduled in the above-captioned matter from February 1, 2021 to April 1, 2020, or such other date in or after April 2021 that is convenient for the Court. In support of this motion, Mr. Kabra states as follows:

1. On Sept. 17, 2020, the Court set a Final Pretrial Conference in this matter for January 21, 2021 and a trial date of February 1, 2021. (ECF No. 112).
2. On October 26, 2020, Michael J. Connolly and Julianna Malogolowkin entered their appearances on behalf of Defendant in this matter. (ECF Nos. 117 and 118). Thereafter, on November 5, 2020, Defendant's predecessor counsel filed their Withdrawals of Appearance (ECF No. 119).
3. Attorneys Connolly and Malogolowkin have worked diligently to get up to speed on the various legal and factual issues presented in this case. However, in light of the

complexity of the case, the significant discovery material (approximately 53 gigabits of data), and the constraints caused by the COVID-19 pandemic, Defendant's counsel require additional time to prepare for trial.

4. Assistant United States Attorney Chris Looney has advised that he assents to the requested relief.

For the foregoing reasons, Defendant respectfully requests that the Court continue the trial scheduled in this matter to April 1, 2021, or such other date in or after April 2021 that is convenient for the Court.

Respectfully submitted,

TANMAYA KABRA

By his attorneys,

/s/ Michael J. Connolly

Michael J. Connolly, BBO#638611
Julianna Malogolowkin, BBO#693320
HINCKLEY, ALLEN & SNYDER LLP
28 State Street
Boston, MA 02109
mconnolly@hinckleyallen.com
jmalogolowkin@hinckleyallen.com
Tel. (617) 345-9000
Fax (617) 345-9020

Dated: December 15, 2020

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document filed through the ECF system will be sent electronically by the ECF system to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 15, 2020.

/s/ *Michael J. Connolly*

Michael J. Connolly